

THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 2:06CR298-WKW
)
REGINALD LASHAWN SAWYER)

UNITED STATES MOTION DOWNWARD DEPARTURE
PURSUANT TO 18 U.S.C. 3553(e) AND
U.S.S.G. 5K1.1 FOR SUBSTANTIAL ASSISTANCE

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and pursuant to Title 18, U.S.C. 3553(e) and Section 5K1.1 of the United States Sentencing Guidelines, respectfully requests this Honorable Court to reduce defendant's offense by three (3) levels; as reasons therefore, submits the following:

1. From the time of his indictment, Sawyer has agreed to cooperate with both agents of the United States and the State of Alabama.
2. Specifically, Sawyer was debriefed by Agent Rebecca Sparkman of the Montgomery Police Department's Special Operations Division. According to Agent Sparkman, Sawyer provided valuable information regarding drug trafficking and other crimes in Montgomery County, Alabama. Although this information has not yet resulted in any arrests, it has created a number of active investigations into crimes and individuals not previously known to Montgomery County law enforcement officials. Agent Sparkman believes that Sawyer's information will lead to arrests. Sawyer has agreed to cooperate with law enforcement, including providing testimony to the State of Alabama.
3. As part of the plea agreement, Sawyer has waived his right to appeal and/or

collaterally attack the sentence imposed in this case.

4. After providing information regarding criminal activity, the United States agrees that a certain degree of risk arises for defendant's and their families.

5. The United States notes that even with this motion for downward departure, Sawyer still faces 151 to 188 months incarceration

Wherefore, premises considered, the United States moves this Honorable Court grant an downward departure, pursuant to Title 18, U.S.C. 3553(e) and U.S.S.G. 5K1.1, of 3 levels for Sawyer's substantial assistance.

Respectfully submitted this the 12th day of February, 2008.

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UNITED STATES ATTORNEY

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IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:06CR228-WKW
)	
REGINALD LAWSHAWN SAWYER)	

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Donnie Bethel.

Respectfully submitted,

LEURA GARRETT CANARY
UNITED STATES ATTORNEY

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